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**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF ARIZONA**

In re:
GREEN FUEL TECHNOLOGIES, L.L.C.
Debtor.

Case No. 2:17-bk-00594-BMW

Chapter 11

**SECURED CREDITOR'S
EVIDENTIARY OBJECTIONS TO
EXHIBITS LISTED BY DEBTOR**

**Hearing Date:
February 17, 2017**

**Hearing Time:
10:30 am**

Secured Creditor UMB Bank, n.a. ("UMB"), by and through undersigned counsel, submits these objections to the exhibits listed by Chapter 11 debtor Green Fuel Technologies, L.L.C. ("Debtor") in connection with the evidentiary hearing on the Debtor's Emergency Motion For Order Authorizing Debtor's Use Of Cash Collateral ("Motion") [Doc. 9].

GENERAL OBJECTIONS

UMB generally objects to all documents not timely disclosed. On February 2, 2017, UMB served discovery requests seeking expedited production by no later than Tuesday, February 7. UMB supplemented the requests on February 2, 2017, with an additional category of documents (evidence of inventory values). The Debtor produced some responsive documents, but a number of the listed exhibits were not timely produced.

UMB also generally objects to all documents as to lack of authentication.

SPECIFIC OBJECTIONS

A. Cash flow spreadsheet for week ending 2/10/17 through 5/5/17

Objection: Foundation, Hearsay.

B. Spreadsheet of current accounts payable by project as of 1/26/17

Objection: Foundation, Hearsay.

C. Report of accounts receivable as of 2/10/17

No objection.

D. Green Fuel Technologies' bankruptcy schedules

No objection.

E. Titan Bank (SBA) note

Objection: Relevance, hearsay.

F. Titan Bank security agreement

Objection: Relevance, hearsay.

G. Deed of trust recorded by Titan Bank

Objection: Relevance.

H. UCC financing statement filed by Titan Bank

Objection: Relevance.

I. Appraisal of commercial property

Objection: Relevance, hearsay, foundation.

J. Lease agreement between Green Fuel and NextGen 51

Objection: Relevance, hearsay, foundation.

K. Subcontract with Capital GC Inc. for SCNM clinic project

No objection.

L. Subcontract with Ames Construction for ADOT-Ajo Way project

No objection.

M. Subcontract with Granite Construction for ADOT-Sierra Vista project

No objection.

1 N. General Services Agreement with Calamco NH3, LLC
2 No objection.
3 O. Grannus/Calamco work authorization
4 No objection.
5 P. Sales and Installation Contract with James Pavoggi
6 No objection.
7 Q. Sales and Installation Contract with Steve Remenap
8 No objection.
9 R. Subcontract for Pavoggi residence with PapaDee's Construction
10 No objection.
11 S. Subcontract for Schultz residence with PapaDee's Construction
12 No objection.
13 T. Invoice issued by Green Fuel to ABB Power One
14 No objection.
15 U. Invoice issued by Green Fuel to Alliance Defending Freedom
16 No objection.
17 V. Invoice issued by Green Fuel to Ames Construction
18 No objection.
19 W. Invoices issued by Green Fuel to AORA Solar
20 No objection.
21 X. Invoices issued by Green Fuel to Arizona Solar Solutions
22 No objection.
23 Y. Invoice issued by Green Fuel to John Blasdel
24 No objection.
25 Z. Invoices issued by Green Fuel to Calamco
26 No objection.
27 AA. Invoice issued by Green Fuel to Granite Construction
28 No objection.

1 BB. Invoices issued by Green Fuel to PapaDee's Construction
2 No objection.
3 CC. Invoice issued by Green Fuel to Ron Reed
4 No objection.
5 DD. Invoices issued by Green Fuel to Capital GC Inc.
6 No objection.
7 EE. Invoice issued by Green Fuel to Brad Soden
8 No objection.
9 FF. Pet Planet bid proposal
10 **Objection: Relevance, hearsay, foundation.**
11 GG. Scottsdale Auto bid proposal
12 **Objection: Relevance, hearsay, foundation.**
13 HH. Prickly Pear residence bid proposal
14 **Objection: Relevance, hearsay, foundation.**
15 II. Lemke residence bid proposal
16 **Objection: Relevance, hearsay, foundation.**
17 JJ. Advanced Auto Parts bid proposal
18 **Objection: Relevance, hearsay, foundation.**
19 KK. Allison Road bid proposal
20 **Objection: Relevance, hearsay, foundation.**
21 LL. Cherry Creek — Sundt bid proposal
22 **Objection: Relevance, hearsay, foundation.**
23 MM. Houghton Road bid proposal
24 **Objection: Relevance, hearsay, foundation.**
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1 NN. All exhibits listed by UMB Bank

2 No objection.

3 DATED this 10th day of February, 2017.

4 BRYAN CAVE LLP

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6 By /s/ KSH, 024155

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10 ELECTRONICALLY FILED
11 this 10th day of February, 2017.

12 COPY served via email and/or US Mail
this 10th day of February, 2017, upon:

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